

## **REMARKS**

### **INFORMATION DISCLOSURE STATEMENT**

The Examiner has indicated that the information disclosure statement filed April 9, 2004 is defective and specifically there is no copy or portion of the Arsenault non-patent document. The applicants have attached a copy of this non-patent document and a revised IDS for non-patent literature to this amendment. It is to be noted that the first named author of the document is Arsenault, André C., instead of Arsenault C. as listed previously. In addition, the title is substantially longer than that previously presented, but still directed to Photonic Ink. Such variation is understandable because it was listed as being in press at the time of the submission of the original IDS and possibly the finalized version was not available to the attorney on record. The article is the only submission by any person named Arsenault in the issue dated March 17, 2003 (in fact, the only submission in 2003) according to the journal's website as of today.

### **CLAIM OBJECTIONS**

Claims 6, 7, 14, 23, 24 and 32 are objected to due to incorrect dependencies and/or grammatical errors. The applicants thank the Examiner for pointing them out and the amendments presented above render the objections moot.

### **CLAIM REJECTIONS (35 U.S.C. §112)**

Claims 20, 22, 28 and 30 are rejected under 35 U.S.C. §112 second paragraph as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicants regard as the invention.

The rejection is based on the reading that the claims in question recite "each plurality of placards." However, the applicants' record and the published application (US

2005/0162396A1) both show that in all these instances the wording is “each of the plurality of placards” which is consistent with the prior claims that call for a single plurality of placards. The applicants acknowledge that the use of “are” in “each of the plurality of placards are visibly locatable” is grammatically incorrect and might have led to the confusion. Amendments have been presented to correct the mistake.

#### **CLAIM REJECTIONS (35 U.S.C. §102)**

1. Claims 1-8, 17-18 and 32 are rejected under 35 U.S.C. 102(b) as being anticipated by Albert et al. (U.S. 6,118,426).

The independent claims 1 and 17 as amended both recite “at least one coupler connected to at least one member selected from the group comprising an in-flight entertainment system, an airline reservation system, and an airline boarding system for receiving a second customer specific message therefrom.” The independent claim 32 as amended recites “retrieving a second customer specific message associated with each of the placard identifications through at least one coupler from at least one member selected from the group comprising an in-flight entertainment system, an airline reservation system, and an airline boarding system, wherein said at least one coupler being coupled to the receiver and said at least one member.” The inclusion of such at least one coupler in the receiver and retrieving a customer specific message therethrough from the various systems prevents the affected claims from anticipation by Albert, as such teaching is not found in Albert. The amendment does not introduce new matter and the antecedent basis is found in paragraphs [0031] and [0038] which recite “The message(s) may be...received from a network coupled to it (such as an In-Flight Entertainment System)”

and paragraph [0056] which recites “Messages may be retrieved from an In-Flight Entertainment, airline reservation, boarding or other system...”

Claims 2-8 depend from claim 1 and claim 18 depends from claim 17. Therefore, the rejection of claims 1-8, 17-18 and 32 due to anticipation by Albert should be withdrawn.

#### **CLAIM REJECTIONS (35 U.S.C. §103)**

1. Claim 9 is rejected under 35 U.S.C. 103(a) as being unpatentable over Albert et al. in view of Applicant’s admitted prior art (hereinafter APA).

The Examiner relied on Albert to teach the claim 1 and APA to teach a photonic ink display. As presented above, Albert fails to teach the claim 1 as amended. Therefore, the rejection of claim 9 should be withdrawn.

2. Claims 10-14 and 39 are rejected under 35 U.S.C. 103(a) as being unpatentable over Albert in view of Gelbman (US 6,753,830).

Claim 10 teaches a message memory coupled to the receiver in addition to all of the elements specified in the parent claim (claim 1). The Examiner relied on Albert as disclosing all the elements of claim 1 and relied on Gelbman as disclosing a message memory coupled to the receiver. As presented above, Albert fails to teach the claim 1 as amended and Gelbman fails to cure this deficiency (the absence of teaching of at least one coupler connected to at least one member selected from the group comprising an in-flight entertainment system, an airline reservation system, and an airline boarding system for receiving a second customer specific message therefrom). Therefore, the rejection of claim 10 should be withdrawn.

Claims 11-14 depend from claim 10 and the rejections thereof should be withdrawn.

Claim 39 also depends from claim 1. The Examiner relied on Albert to teach all of the limitations of claim 1 and relied on Gelbman to disclose the teaching of setting a void, clear, opaque or dark screen. As presented above with respect to claims 1 and 10, Albert fails to teach the claim 1 as amended and Gelbman fails to cure this deficiency.

Therefore, the rejection of claim 39 should be withdrawn.

3. Claims 15-16, 24-26 and 33 are rejected under 35 U.S.C. 103(a) as being unpatentable over Albert in view of Ehrenberger et al. (U.S. 5,785,283).

With respect to claim 15 (a dependent claim of claim 1), the Examiner relied on Albert to teach all of the limitation of claim 1 and relied on Ehrenberger to teach the inclusion of a transponder. As presented above, Albert fails to teach the claim 1 as amended and Ehrenberger fails to cure this deficiency, as Ehrenberger fails to teach the at least one coupler as claimed.

Claim 16 depends from claim 15.

Therefore, rejections of claim 15 and 16 should be withdrawn.

With respect to claim 24, the Examiner relied on Albert to teach all of the limitations except that “an acknowledgement signal is sent by a transponder in the placard, or that such a signal is received by a transceiver” and relied on Ehrenberger to disclose a transceiver and an acknowledgement signal. As presented above with respect to claim 1, the claim 24 as amended teaches the at least one coupler connected to various systems for retrieving messages therefrom, which is not taught by Albert. This deficiency is not cured by Ehrenberger.

Claims 25 and 26 depend directly or indirectly from claim 24. Therefore, rejections of claim 24-26 should be withdrawn.

With respect to claim 33, the Examiner relied on Albert to teach all of the limitations of its parent claim (claim 32) and relied on Ehrenberger to teach transmission of a return signal. As presented above with respect to claim 32, Albert fails to teach all of the limitations of claim 32 and Ehrenberger does not cure this particular deficiency. Therefore, rejection of claim 33 should be withdrawn.

4. Claims 19 and 36-37 are rejected under 35 U.S.C. 103(a) as being unpatentable over Albert in view of Isomichi et al. (U.S. 6,633,225).

With respect to claim 19, the Examiner relied on Albert to teach all of the limitations of the parent claim (claim 18) and further relied on Isomichi to teach an airline paging system comprising a plurality of wireless addressed a/v units, each of which displays a passenger's name, flight number and seat number.

Claim 18 depends from claim 17. As presented above, Albert fails to teach all of the limitations of claim 17, thus failing to teach all of the limitations of claim 18. In Isomichi, the boarding information, along with the identification codes, is transmitted from the paging base station (which is interpreted as the equivalent of the transmitter in the application) to the pagers (which is considered as the equivalent of the placards). In the present application, the identification codes and a first customer specific message are transmitted by the transmitter to the placards, and a second customer specific message including boarding information is not retrieved from the transmitter but through a coupler which is a part of a placard and connected to the boarding, reservation and in-flight entertainment systems. A comparison shows that Isomichi fails to teach the "at least one

coupler connected to at least one member selected from the group comprising an in-flight entertainment system, an airline reservation system, and an airline boarding system for receiving a second customer specific message therefrom,” wherein the at least one coupler is a part of the placard. Albert and Isomichi when considered as a whole would not teach or suggest the invention as claimed in claim 19 and the rejection thereof should be withdrawn.

Claims 36 and 37 depend from claim 32. With respect to claim 36, the Examiner relied on Albert to teach all of the limitations of claim 32 and relied on Isomichi to teach a signal having a customer specific message associated with a reserved seat for a specified customer. With respect to claim 37, the Examiner relied on Albert to teach all of the limitations of claim 32 and further relied on Isomichi to teach retrieving the customer specific message from an airline reservation or boarding system. Based on similar arguments presented with respect to claim 19, Albert fails to teach all of the limitations of the base claim (claim 32), in particular for the lack of teaching of the coupler coupled to the placard and the use thereof for receiving a second customer specific message from the various systems and Isomichi fails to cure the deficiency. The rejections of claim 36 and 37 should be withdrawn.

5. Claims 20-23 are rejected under 35 U.S.C. 103(a) as being unpatentable over Albert in view of Matsuzaki et al. (US 4,896,209).

Claims 20-23 directly and indirectly depend from claim 18, which further depends from claim 17. The Examiner relied on Albert to teach all of the limitations of claim 18 and further relied on Matsuzaki to teach each of the plurality of placards being visibly locatable and associable with a plurality of seating positions. As presented above with

respect to claim 17, Albert fails to teach all of the limitations of claim 17 as amended and Matsuzaki fails to cure this deficiency (the lack of the teaching of the coupler). Therefore, the rejection of claims 20-23 should be withdrawn.

6. Claim 27 is rejected under 35 U.S.C. 103(a) as being unpatentable over Albert in view of Ehrenberger and further in view of Isomichi.

The Examiner relied on Albert and Ehrenberger to teach all of the limitations of claim 26 and further relied on Isomichi to teach a customer specific message comprising a seat identification and a user selected name. As presented previously with respect to claim 26, Albert and Ehrenberger fails to teach all of the limitations of claim 26, particularly the lack of teaching of the coupler. Based on similar arguments presented previously with respect to claim 19, Isomichi's paging system also fails to overcome this deficiency (the lack of the teaching of the at least one coupler). Therefore, Albert, Ehrenberger and Isomichi when considered as a whole would not teach or suggest the claimed invention. The rejection of claim 27 should be withdrawn.

7. Claims 28-31 are rejected under 35 U.S.C. 103(a) as being unpatentable over Albert in view of Ehrenberger and further in view of Matsuzaki.

Claims 28-31 directly or indirectly depend from claim 26. The Examiner relied on Albert and Ehrenberger to teach all of the limitations of claim 26 and further relied on Matsuzaki to teach associating the placards with seats.

As presented above with respect to claim 26, which in turn depends from claim 24, Albert and Ehrenberger fail to teach or suggest all of the limitations of claim 26, particularly the lack of teaching of a coupler connected to various systems for receiving a second customer specific message therefrom. Based on similar arguments presented

previously with respect to claim 19, Isomichi's paging system fails to overcome this deficiency (the lack of the teaching of the at least one coupler). Therefore, Albert, Ehrenberger and Isomichi when considered as a whole would not teach or suggest the claimed invention. The rejection of claims 28-31 should be withdrawn.

8. Claims 34-35 are rejected under 35 U.S.C. 103(a) as being unpatentable over Albert in view of Brieche et al. (US 5,977,998).

Claims 34-35 directly or indirectly depend from claim 32. The Examiner relied on Albert to teach all of the limitations except for waiting for a specified period by using a timer coupled to a memory that is started upon the action of displaying the customer specific message on the display, and further relied on Brieche to cure the deficiency. As presented above with respect to claim 32, Albert fails to teach all of the limitations of claim 32 which is the parent of claims 34-35. Brieche would not be able to cure this deficiency, i.e., retrieving a second customer specific message associated with each of the placard identifications through at least one coupler from various systems.

9. Claim 38 is rejected under 35 U.S.C. 103(a) as being unpatentable over Albert, in view of Brieche and further in view of Isomichi.

Claim 38 depends from claim 34, which in turn depends from claim 32. The Examiner relied on Albert and Brieche to teach all of the limitations of claim 34 and further relied on Isomichi to teach that the messages are retrieved from an in-flight entertainment, airline reservation or boarding system. As presented above, Albert fails to teach all of the limitations of claim 32 and Albert and Brieche when considered as a whole fail to teach all of the limitations of claim 34. In particular, the failure is due to the lack of the teaching of retrieving a second customer specific message associated with



each of the placard identifications through at least one coupler from various systems, wherein the at least one coupler is also coupled to the receiver. Based on similar arguments presented previously with respect to claim 19, Isomichi fails to cure this deficiency. Therefore, the rejection of claim 38 should be withdrawn.

**SUMMARY**

In view of the above, it is respectfully requested that the Examiner's rejections be withdrawn and the claims indicated as allowable to the applicant.

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Date

Respectfully Submitted,

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